

Exhibit B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: MULTIPLAN HEALTH
INSURANCE PROVIDER LITIGATION

This Document Relates To:

ALL ACTIONS

Case No. 1:24-cv-06795
MDL No. 3121

Hon. Matthew F. Kennelly

Defendants' [Proposed] Scheduling Order

<u>EVENT</u>	<u>DATE</u>
First day on which 3rd Set of RFPs and other written discovery requests may be served.	June 24, 2025 (Tues)
Production of structured data samples (at least 50 lines) regarding structured data field names previously provided pursuant to RFP No. 3	July 24, 2025 (Thurs)
Answers and Counterclaims Under FRCP 12 to Consolidated Class Action Complaint and Amended Consolidated Master Direct Action Plaintiff Complaint	August 12, 2025 (Mon)
Deadline for producing party's disclosure of initial list of its own proposed document custodians and custodial sources as to requests for which it agrees to produce documents [ESI Protocol V.A]	August 25, 2025 (Mon)
By no later than 45 days after service of responses and objections to the third sets of requests for production, the Parties will: (a) submit a TAR/AI Protocol to the Court or (b) submit letter briefs of no more than 5 pages total for Plaintiffs and one letter brief of no more than 5 pages total for Defendants concerning any	September 8, 2025 (Mon)

<u>EVENT</u>	<u>DATE</u>
disputes as to the TAR/AI Protocol. [from ESI Protocol Section E.2.a.]	
Deadline to submit agreed deposition protocol and agreement on number of fact depositions, or joint motion setting forth areas of dispute	September 8, 2025 (Mon)
Joint status report and a proposed order concerning agreements on the scope and format of production of structured data or, if disagreement on the proposed order, Plaintiffs collectively may file a letter brief of up to 10 pages and Defendants collectively may file a letter brief of up to 10 pages.	September 18, 2025 (Thu) 57 days after submission of data samples This joint status report and proposed order should also address the timing for production of structured data.
Deadline to complete search methodology negotiations and submit any remaining search term disputes relating to 3rd RFPs. ESI Protocol Section V.E.3.e-f (pages 27-28).	October 22, 2025 (Wed) 120 days after service of 3rd RFPs
Deadline to complete production of structured data requested in Plaintiffs' and Defendants' Third Set of RFPs	Deadline to be determined by the parties' agreement after meet and confer, or the Court's resolution of any disputes, regarding the production of structured data.
Deadline for any motions to amend the pleadings	January 21, 2026 (Weds)
Deadline for substantial completion of document productions in response to Third Set of RFPs	April 9, 2026 (Thu) 290 days after service of third set of RFPs
Last day on which parties may serve requests for production, with the exception of witness-specific requests for production directly related to scheduled depositions	September 24, 2026 (Thu) ~75 days before close of fact discovery
Last day on which parties may serve interrogatories	October 23, 2026 (Fri) ~45 days before close of fact discovery
Close of Fact Discovery	December 8, 2026 18 months after scheduling conference/order

<u>EVENT</u>	<u>DATE</u>
Class and DAP Plaintiffs' Opening Merits and Class Certification Expert Reports	January 29, 2027 45 days following close of fact discovery
Defendants' Merits and Class Certification Opposition Expert Reports	April 29, 2027 90 days following opening reports)
Class and DAP Plaintiffs' Rebuttal Expert Reports	July 28, 2027 90 days following opposition reports
Close of Expert Discovery	September 10, 2027 44 days following rebuttal reports
Class Certification Motion	October 25, 2027 45 days following close of expert discovery
Class Certification Opposition Brief	December 9, 2027 45 days following class cert motion
Class Certification Reply Brief	January 23, 2028 45 days following oppositions
Class Certification Hearing	Court's discretion
Summary Judgment Motions	90 days following class cert decision. Defendants also propose a second round of <i>Daubert</i> for merits experts.
Summary Judgment Opposition Briefs	60 days following SJ/ <i>Daubert</i> motions
Summary Judgment Replies	30 days following SJ/ <i>Daubert</i> oppositions
Daubert Motions	Defendants propose that <i>Daubert</i> motions as to class certification experts follow the exact same timeline as briefing on the class certification motion, set forth above. Defendants propose that <i>Daubert</i> motions as to merits experts follow the exact same timeline as briefing on the summary judgment motions.

<u>EVENT</u>	<u>DATE</u>
Parties to submit joint status report or stipulation concerning (1) remand or transfer of cases centralized by Judicial Panel on Multidistrict Litigation, (2) deadlines for motions in limine briefing and evidentiary stipulations, and (3) deadlines for all remaining DAP actions	Court's discretion
Pre-Trial Conference	Court's discretion
First Trial Begins	Court's discretion

SO ORDERED this ____ day of _____, 2025.

Honorable Matthew F. Kennelly
United States District Judge